

# EXHIBIT B

# CLASS ACTION SERVICES

CLASS ACTION  
ADMINISTRATION



## PRE-SETTLEMENT CONSULTING

- We consult with clients on how to develop allocation methodologies, and have testified regarding their fairness.
- We have been appointed as Special Master in a number of class settlements, designing allocation methods, medical monitoring programs, and resolving appealed claims.
- We will work with the parties to compile the class list, or will serve as an independent auditor of an existing class list to verify completeness.

## NOTICE PROGRAM

- We manage the entire CAFA Notice process for Defendants with our proprietary database of officials who need to be notified.
- We advise clients on best notice practices to ensure plain language and cost-effective notice.
- We are experienced in preparing usable class lists from various sources, including transcribing class member information from physical documents.
- Our notice and claim form mailing services utilize creative options to improve class awareness and participation. We maintain data quality by utilizing change of address updates and providing further research services if necessary.
- Our advertising team is expert at handling all media publication needs and we obtain the best rates available while maximizing the effectiveness of placement.
- We establish toll-free numbers with direct access to our team instead of an outside resource.
- We build and maintain case-dedicated websites with the appropriate functionality for a given class.

## CLAIMS PROCESSING

- Our team is readily available to draft or assist in drafting claim forms to ensure class member comprehension and complete claim form submissions.
- Our proprietary databases efficiently capture claim form data as well as accurate and flexible reporting.
- We provide accurate and cost-effective means for capturing the information necessary to determine claim eligibility and benefit levels.
- Our proprietary on-line claim submission site provides secure submission, reducing overall claims processing costs by 75% from traditional claim methods.
- Because each case is different, we offer customized reporting to provide a variety of perspectives on the data that our clients may not have considered.

## BENEFIT DISBURSEMENT

- We manage all aspects of the settlement fund, including opening disbursement accounts, reconciling accounts, establishing a Qualified Settlement Fund (QSF), filing tax returns, and serving as Escrow Agent.
- We implement even the most complex benefit allocation methodology and apply it to individual class members.
- Our team has distributed billions of dollars in settlement benefits in the form of checks and non-check benefits, while ensuring that extensive anti-fraud measures are in place.
- We manage tax reporting for settlement disbursements, including the issuance of tax statements, such as W-2s and 1099s, to class members. We also calculate the payroll withholding and employer taxes that are often required in employment class action settlements. We partner with a respected CPA firm to prepare settlement fund tax returns.

# WHAT WE'VE DONE

Here are a few of the more notable class action matters that we have managed:

Aleah Guillory, et al. v. County Of Los Angeles  
 AT&T Mobility Reward Card  
 Auction Houses Antitrust Settlement  
 Batchelder v. Kerr-McGee Corporation, et al.  
 Benjamin Careathers v. Red Bull North America, Inc.  
 Brent v. Midland Credit Mgt  
 C Debaca v. South Globeville  
 Cobell v. Salazar  
 Doyle v. Doe Run (Fluor Corporation)  
 Engle Trust Fund  
 Expedia Hotel Taxes and Fees Litigation  
 Fitzgerald Farms, LLC v. Chesapeake Operating, Inc.  
 Gates v. City Of Chicago  
 In re Bank of America Corp. Sec. Litig.

In re Deepwater Horizon  
 In re IPO Securities Litigation  
 In re Visa Check/MasterMoney Antitrust Litigation  
 Jacksonville Auto Dealership  
 Maas v. Penn Central  
 Morey v. Louis Vuitton  
 Parker v. Berkeley Premium Nutraceuticals, et al.  
 Royal Ahold Securities and ERISA Litigation  
 Ryan-House v. GlaxoSmithKline PLC  
 Samples v. Conoco, Agrico & Escambia Treating  
 State Of Colorado v. General Steel, et al.  
 Vizzi v. Mitsubishi Motors North America  
 Wolf, et al. v. Red Bull GmbH, et al.  
 Worldcom Securities Litigation

# WHO WE ARE

**JND CLASS ACTION ADMINISTRATION**, a JND Legal Administration company, delivers comprehensive administrative resources to its clients through its pre-settlement consultation, complete notice services, claims processing and validation, scalable call center capabilities, state-of-the-art website design for static and interactive case specific sites, and array of distribution services. The principals of JND—(J) Jen, (N) Neil, and (D) David have handled some of the most complex class action settlements in the country's history. The JND founders have worked with leading partners on both sides of the aisle, as well as with Fortune 500 companies to help design and effectuate class action settlements worth billions of dollars affecting hundreds of millions of people. JND's Class Action Administration division has been one of the leading administrators in the country for the past six years and was recently named "Best Claims Administrator" in the United States by the *National Law Journal*.

**JENNIFER KEOUGH** has handled some of our country's largest, high-profile engagements and previously held executive positions at one of the then most-recognized legal administration firms. Prior to forming JND, Jen worked as a class action business analyst at one of the country's highly-regarded law firms, responsible for managing complex class action settlements.

**NEIL ZOLA** has personally overseen dozens of the most involved legal administration projects in our country's history. Prior to forming JND, Neil held positions as general counsel, chief operating officer and president at one of the then largest legal administration firms in the country.

**DAVID ISAAC** has been a leader in the legal administration business for over twenty years and is credited with changing the industry landscape by providing "one-stop shopping" service offerings. David was previously the CEO of the then largest legal administration firms in the country and was a member of the global executive management team for its parent company.

**AMANDA HORN** is SVP of Client Services for JND Legal Administration. Amanda has spent over 20 years practicing law and in various leadership roles at well-known legal administration firms.

**CHARLES LAWSON** is SVP of JND Government Services. Charles has more than 15 years of contracting, program management, and leadership experience with the federal government.